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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and
PATRICIA CAULEY on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS
AMERICA, INC. and SONY
ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)
Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Joseph A. Dickson, U.S.M.J.

Return Date: TBD

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO
COMPEL INDIVIDUAL
ARBITRATION AND STRIKE
PLAINTIFFS' CLASS CLAIMS**

PLEASE TAKE NOTICE that on such date and time as may be set by the
Court, Defendant Samsung Electronics America, Inc. ("SEA"), by and through its

undersigned attorneys, shall move for an Order granting it's Motion To Compel Individual Arbitration And Strike Plaintiffs' Class Claims.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant will rely on the accompanying Brief In Support of SEA's Motion to Compel Individual Arbitration and Strike Plaintiffs' Class Claims, Declaration of Khaled Abuali with exhibits, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that SEA hereby requests oral argument.

Dated: October 2, 2020

Respectfully submitted,

By: s/ Michael R. McDonald
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